

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Juan C. Clemente Hernández, being duly sworn, depose and state:

Introduction

1. I am a Task Force Officer (TFO) with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), San Juan, Puerto Rico and have been so employed since 2022. My responsibilities and duties include conducting investigations of alleged manufacturing, distribution, or possession of controlled substances (Title 21, *United States Code*, Section 841(a)(1)), importation of controlled substances (Title 21, *United States Code*, Section 952(a)), smuggling of goods into the United States (Title 18, *United States Code*, Section 545), and related offenses. I am an investigative or law enforcement officer of the United States who is empowered to conduct investigations of or to make arrests for offenses enumerated in Title 18, *United States Code*, Section 2516.

2. I have attended the San Juan Municipal Police Department Academy in San Juan, Puerto Rico. I am currently assigned to the Public Safety Group (PSG), where investigations commonly conducted are related to violations of Titles 8, 18, 19, 21 and 31 of the *United States Code*. Prior to my tenure with HSI, I was a Homicide Detective with the Puerto Rico Police Bureau (“PRPB”) since 2020.

3. I have assisted in conducting investigations into the unlawful possession of firearms, trafficking of firearms, and use and possession of firearms by persons

prohibited by law. I am familiar and have participated in various methods of investigations, including, but not limited to electronic surveillance, physical surveillance, interviewing and general questioning of witnesses, use of confidential informants, use of cooperating witnesses, and use of toll records and subscriber information. I have also debriefed confidential informants and cooperating witnesses regarding the habits and practices of people engaged in the illegal trafficking of firearms.

4. The facts and information contained in this affidavit are based upon my training and experience, participation in this investigation, personal knowledge and observations made during the course of this investigation, as well as the observations of other agents and police officers involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of records, documents, and other physical evidence obtained during the investigation.

5. This affidavit contains information necessary to support probable cause. It is not intended to include every fact and matter observed by me or known to the United States. This affidavit contains information necessary to support probable cause for a criminal complaint charging **Manueli VARGAS-Camacho** (“**VARGAS-Camacho**”) with violation of 18 U.S.C. § 922(K) (Possession of a Firearm with an Obliterated Serial Number).

Facts Supporting Probable Cause

6. On March 22, 2025, at approximately 12:00 a.m., Homeland Security Investigations (HSI) Special Agents (SA) and Task Force Officers (TFOs) were assisting the Guaynabo City Police Department (GCPD) in the execution of various business checks with the Area of Responsibility of Guaynabo, Puerto Rico.

7. On the same date, at approximately 4:05 am, GCPD, alongside side HSI SA's and TFO's arrived at a business named "La Cuestita", located in State Road 169 in Guaynabo, Puerto Rico.

8. Upon arrival to the establishment, HSI personnel observed an individual wearing a red shirt, (later identified as **Manueli VARGAS-Camacho, herein referred to as VARGAS-Camacho**) flee the establishment and run down a flight of stairs located on the left-hand side of the establishment.

9. A HSI Special Agent followed **VARGAS-Camacho** and gave him verbal commands to stop. The Agent observed that **VARGAS-Camacho** was holding a firearm and subsequently the Agent observed that **VARGAS-Camacho** tossed the firearm underneath a parked vehicle, to which **VARGAS-Camacho** was standing next to. The HSI Special Agent continued to give **VARGAS-Camacho** verbal commands, to which he complied. **VARGAS-Camacho** was placed under arrest by surrounding agents at that point in time.

10. The following items were recovered from the underneath of beforementioned vehicle next to where **VARGAS-Camacho** was arrested:

- (i) (1) One Smith and Wesson Pistol with an obliterated model and serial number (loaded with one round in the chamber),
 - (ii) (1) One silver magazine loaded with:
 - (iii) (6) rounds of .40 caliber ammunition
11. **VARGAS-Camacho** was transported to GCPD Central Precinct for further processing. HSI agents later conducted an interview on **VARGAS-Camacho**. **VARGAS-Camacho** was read his Miranda Rights in his native language of Spanish and waived his rights in writing, signing an Immigration and Customs Enforcement (ICE) Miranda rights document.
12. **VARGAS-Camacho** stated to HSI agents that he had found the firearm in question approximately one year ago, in an area in front of his residence where waste is disposed of. When asked if he knew if the firearm had an obliterated serial number, **VARGAS-Camacho** stated that he had knowledge of it and that the pistol was in those conditions when he found it. **VARGAS-Camacho** also stated to HSI agents that he was a legal owner of a firearm for approximately seven to eight years, and that it was seized from him as a result of a prior criminal case against him.
13. **VARGAS-Camacho** stated to HSI agents that he tried to leave the establishment to get rid of the pistol because he knew he was not supposed to be in possession of a firearm.

14. The investigation revealed that no firearms and ammunition, including the types described above, are manufactured in Puerto Rico and therefore the firearms and ammunition had been shipped or transported in interstate or foreign commerce.

15. Below is a picture of the obliterated serial number of the firearm:



Conclusion

16. Based on the facts contained herein, there is probable cause to believe that Manueli **VARGAS-Camacho** has violated the following offense: 18 U.S.C. § 922(K) (Possession of a Firearm with an Obliterated Serial Number).

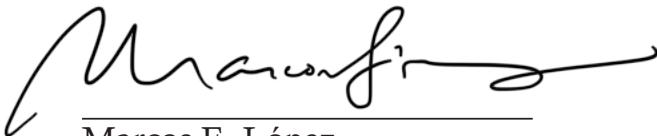
I hereby declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

JUAN C CLEMENTE-
HERNANDEZ

Digitally signed by JUAN C
CLEMENTE-HERNANDEZ
Date: 2025.03.22 12:08:21
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Juan C. Clemente Hernández
Task Force Officer
U.S. Homeland Security Investigations

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone at 2:15 p.m. on the 22 day of March 2025.



Marcos E. López
Magistrate Judge
United States District Court District
of Puerto Rico